

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO.

v. : DATE FILED

CHARLES E. POOLE, III : VIOLATIONS:

: 18 U.S.C. § 1349 (conspiracy to commit mail

: and wire fraud - 1 count)

: 18 U.S.C. § 1028(f) (conspiracy to commit

: identification document fraud – 1 count)

: 18 U.S.C. § 1029(b)(2) (conspiracy to commit

: access device fraud – 1 count)

: 18 U.S.C. § 1344 (bank fraud – 2 counts)

: 18 U.S.C. § 1029(a)(2) (access device fraud – 2

: counts)

: 18 U.S.C. § 1028A(a)(1) (aggravated identity

: theft – 6 counts)

: 18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this indictment:

1. Citibank was a financial institution that issued and serviced Best Buy, Home Depot, Tractor Supply, and Sears credit cards and did business in interstate and foreign commerce. Credit cards and letters denying credit were mailed by Citibank using the U.S. Mail or commercial interstate carrier. All applications for Citibank credit, whether mailed or sent electronically, were stored on Citibank servers located at the Citibank data centers in either Nebraska or Arizona.

2. Synchrony Bank was a financial institution that issued and serviced La-Z-Boy, Gap, and Lowe's credit cards and did business in interstate and foreign commerce. Credit cards and letters denying credit were mailed by Synchrony using the United States Mail or commercial interstate carrier. All applications for Synchrony credit, whether mailed or sent electronically, were stored on Synchrony servers located at the Synchrony data centers in either Texas or Arizona.

3. Wells Fargo Bank was a financial institution that issued and serviced Johnny Janosik World of Furniture credit cards and did business in interstate and foreign commerce.

4. TD Bank was a financial institution that issued and serviced Target, Nordstrom, and Raymour and Flanigan credit cards and did business in interstate and foreign commerce. Credit cards and letters denying credit were mailed by TD Bank using the U.S. Mail or commercial interstate carrier. All applications for TD Bank credit, whether mailed or sent electronically, were stored on TD Bank servers located at the TD Bank data center in Minnesota.

5. Capital One Financial Corporation ("Capital One") was a financial institution that issued and serviced Neiman Marcus credit cards and did business in interstate and foreign commerce. Credit cards and letters denying credit were mailed by Capital One using the United States Mail or commercial interstate carrier. All applications for Capital One credit, whether mailed or sent electronically, were stored on Capital One servers located at Capital One data centers in either, Minnesota, Illinois, Virginia, New York, or North Carolina.

6. Best Buy, Home Depot, Tractor Supply Company, Sears, La-Z-Boy, Gap, Lowe's, Johnny Janosik World of Furniture, Target, Nordstrom, Raymour and Flanigan, Neiman

Marcus, Verizon Wireless, AT&T, and T-Mobile (collectively the “Retailers”) operated retail stores that sold merchandise and did business in interstate and foreign commerce.

7. The Retailers allowed customers to apply for instant credit in their respective retail stores by completing electronic applications for the issuance of new credit cards issued by the financial institutions that serviced the Retailers’ credit cards. All electronic applications for new Retailers’ credit cards were transmitted electronically via wire communication in interstate commerce from the Retailers’ store locations at which the customer completed the application, to data centers located in states other than Pennsylvania.

8. One Main Financial was engaged in the business of providing personal installment loans, via the internet by requiring applicants to fill out an on-line loan application.

9. All electronic applications for personal installment loans submitted electronically to One Main Financial via the internet were transmitted by wire from the location where the application was uploaded to a One Main Financial server located in Indiana.

10. U-Haul operated vehicle rental locations from which persons could rent vans, trucks, and other vehicles, and did business in interstate and foreign commerce.

THE CONSPIRACY

11. Beginning in or about or sometime prior to February 2018 and continuing until in or about February 2020, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the District of Delaware, and elsewhere, defendant

CHARLES E. POOLE, III

conspired and agreed, with others known and unknown, to commit offenses against the United States, that is, to devise a scheme to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of

executing this scheme cause the transmission of wire and mail communications in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1341 and 1343.

MANNER AND MEANS

It was part of the conspiracy that:

12. Defendant CHARLES E. POOLE, III acquired stolen personally identifiable information and other means of identification, including names, credit card information, dates of birth, social security numbers, addresses, and credit histories, of persons (hereinafter the “Victims”) located in the Eastern District of Pennsylvania and elsewhere, all without the Victims’ knowledge and consent.

13. A co-conspirator known to the grand jury (hereinafter “False ID Maker #1”), in the Eastern District of Pennsylvania, ordered counterfeit Pennsylvania driver’s license holograms, which could be used to create counterfeit Pennsylvania drivers’ licenses that would appear to be genuine, from an unknown individual in China via the internet, which False ID Maker #1 caused to be shipped in interstate and foreign commerce from China via private commercial interstate and foreign carrier.

14. False ID Maker #1 obtained and possessed items utilized in the manufacture of counterfeit and false drivers’ licenses, including a magnetic stripe card reader, laptop computers, flash drives, SD memory cards, embossing machines, high-quality color printers, paper trimmers, and laminators.

15. Defendant CHARLES E. POOLE, III recruited other co-conspirators (hereinafter the “Runners”) to utilize the stolen means of identification of the Victims to pose as the Victims and enter banks, lenders, and merchants to obtain loans, apply for credit, and purchase merchandise in the names of the Victims, all without the Victims’ knowledge and

consent, in return for the promise of a portion of the proceeds.

16. Defendant CHARLES E. POOLE, III, arranged for Runners to have passport photographs taken of themselves.

17. Defendant CHARLES E. POOLE, III, provided False ID Maker #1 with the means of identification of Victims and passport photographs of Runners, and instructed False ID Maker #1 to prepare false drivers' licenses and other false identification documents in order for the Runners to pose as the Victims.

18. False ID Maker #1 and other co-conspirators created false drivers' licenses in the names of the Victims but containing the photographs of the Runners, as well as false paystubs and other false documents in the names of the Victims that purported to represent proof of income and identity, all without the Victims' knowledge and consent.

19. Defendant CHARLES E. POOLE, III provided some Runners with false drivers' licenses in the names of Victims but containing photographs of the Runners, as well as false proof of income and identity in the names of the Victims.

20. Defendant CHARLES E. POOLE, III provided some Runners with identity information and means of identification of Victims, and instructed those Runners to use the identity information and means of identification to obtain legitimate duplicate Pennsylvania driver's licenses in the names of the Victims from a PENNDOT location by posing as the Victims, all without the Victims' knowledge and consent.

21. Defendant CHARLES E. POOLE, III drove the Runners to FDIC insured bank branch offices and instructed the Runners to use the means of identification of the Victims to determine if the Victims had accounts at the banks, and if so, to obtain copies of their bank statements.

22. Runners entered bank branches and posed as various Victims using the false drivers' licenses and false proof of income and identity in order to determine whether the Victims had any accounts at the banks in question and if so, to obtain copies of their bank statements, all without the Victims' knowledge and consent.

23. One or more co-conspirators used the stolen personally identifiable information and other means of identification of the Victims fraudulently to apply for personal loans in the names of the Victims by submitting loan applications from the Eastern District of Pennsylvania to One Main Financial in the Southern District of Indiana through on-line submissions via the internet, all without the Victims' knowledge and consent.

24. Defendant CHARLES E. POOLE, III drove Runners to One Main Financial branch offices in the Eastern District of Pennsylvania.

25. Runners entered One Main Financial branch offices and posed as various Victims using the false drivers' licenses and false proof of income in order fraudulently to obtain the personal loans that had been previously applied for in the names of the Victims, all without the Victims' knowledge and consent.

26. Runners fraudulently cashed checks they had obtained from One Main Financial that were made payable to Victims at check cashing businesses and financial institutions by posing as the Victims using the false drivers' licenses and other means of identification of the Victims provided by defendant CHARLES E. POOLE, III, all without the Victims' knowledge and consent.

27. Defendant CHARLES E. POOLE, III drove Runners to different Retailers in the Eastern District of Pennsylvania, the District of New Jersey, and the District of Delaware and instructed the Runners to pose as the Victims using the means of identification provided by

defendant POOLE in order to obtain instant credit and fraudulently purchase merchandise in the names of the Victims.

28. Runners used the false drivers' licenses and other means of identification of the Victims to apply for new instant credit in the Victims' names and to access credit accounts in the Victims' names, at various Retailers, including Raymour and Flanigan, Nordstrom Rack, Gap, Lowe's, The Home Depot, Sears, and Best Buy, so that the Runners could fraudulently purchase merchandise and services from the Retailers that would be charged to the credit accounts of the Victims, all without the Victims' knowledge and consent.

29. Defendant CHARLES E. POOLE, III drove Runners to U-Haul locations in the District of New Jersey, and elsewhere, and instructed the Runners to pose as the Victims using the means of identification provided by defendant POOLE in order fraudulently to rent U-Haul trucks that defendant POOLE intended to and did use to pick up and deliver merchandise obtained from Retailers by the Runners posing as the Victims.

30. Runners caused the Retailers to transmit instant credit applications in interstate commerce via the internet to the financial institutions servicing the Retailers' credit cards, where the applications were stored on the financial institutions' servers, all without the Victims' knowledge and consent.

31. Runners caused the financial institutions to send credit cards to the Victims via U.S. Mail and commercial interstate carrier.

32. At the direction of defendant CHARLES E. POOLE, III, Runners posed as Victims and placed mail holds with the United States Postal Service on the Victims' mail intending to intercept the Victims' mail, including new credit cards obtained through instant credit applications, so as to prevent the Victims from learning that loans and credit cards had

been applied for and obtained in the Victims' names and also to obtain the new credit cards in order to use them fraudulently to purchase additional merchandise.

33. Runners placed telephone calls to merchants while posing as Victims in order to facilitate the instant credit applications and purchase of merchandise using the Victims' identities and credit accounts, all without the Victims' knowledge and consent.

OVERT ACTS

In furtherance of the conspiracy, and to achieve its objects, defendant CHARLES E. POOLE, III and other co-conspirators known and unknown committed the following overt acts, among others, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the District of Delaware, and elsewhere:

1. On or about February 18, 2018, defendant CHARLES E. POOLE, III, sent the means of identification of Victim M.G. to False ID Maker #1.

2. On or about April 27, 2018, defendant CHARLES E. POOLE, III, sent the means of identification of Victims M.W., J.W., and L.W. to False ID Maker #1.

3. On or before May 17, 2018, defendant CHARLES E. POOLE, III, recruited a co-conspirator known to the grand jury (hereinafter "Runner #1"), to pose as Victims by promising Runner #1 a share of the proceeds.

4. On or about May 17, 2018, defendant CHARLES E. POOLE, III, sent a passport photograph of Runner #1, along with Runner #1's height and weight, to False ID Maker #1.

5. On or about May 24, 2018, a co-conspirator accessed the internet from the residence of defendant CHARLES E. POOLE, III, in Philadelphia, Pennsylvania, and used the means of identification of victim M.W., including M.W.'s name, address, date of birth, and

social security number, to apply for a personal loan in the amount of approximately \$9,000 from One Main Financial through the submission of an online application in Victim M.W.'s name.

6. On or about June 7, 2018, defendant CHARLES E. POOLE, III sent the means of identification of K.W. to False ID Maker #1.

7. On or about June 18, 2018, defendant CHARLES E. POOLE, III, sent Victim M.W.'s full name to False ID Maker #1.

8. On or about June 18, 2018, at an AT&T store in Norristown, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim M.W. to attempt without success to purchase five cellular telephones, and to successfully purchase two iPhone 10, 64G cellular telephones, with IMEI numbers ending in 8256 and 3586, respectively, each with a retail value of approximately \$800, which were charged to a new account in the name of Victim M.W. that Runner #1 established.

9. On or about June 19, 2018, at a Verizon store in Brookhaven, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim M.W. to purchase approximately five cellular telephones, specifically two iPhone X cellular telephones each with a retail value of approximately \$1,010, two iPhone 8 Plus cellular telephones, each with a retail value of approximately \$810, and one iPhone SE, with a retail value of approximately \$360, all of which were charged to a new account in the name of Victim M.W. that Runner #1 established.

10. On or about June 21, 2018, in State College, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 possessed a fraudulent Pennsylvania drivers' license in Victim M.W.'s name with Victim M.W.'s correct date of birth and address but containing Runner #1's photograph, as well as other means of identification of Victim M.W.,

including Victim M.W.'s social security number and address, along with fraudulent pay stubs and other materials in the name of Victim M.W.

11. On or about June 21, 2018, at a Home Depot store in Bloomsburg, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim M.W. to apply for a Home Depot credit card, issued by Citibank, in the name of Victim M.W.

12. On or about June 21, 2018, at a Tractor Supply store in Muncy, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim M.W. to apply for a Tractor Supply credit card, issued by Citibank, in the name of Victim M.W.

13. On or about June 21, 2018, at the One Main Financial branch office in State College, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 posed as Victim M.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim M.W.'s name but containing Runner #1's photograph, and thereby obtained a check in the amount of approximately \$10,000 that Runner #1 expected to be issued based on a fraudulent loan application previously submitted by a co-conspirator using Victim M.W.'s means of identification.

14. On or about June 21, 2018, at a United Check Cashing branch office in Williamsport, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 posed as Victim M.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim M.W.'s name but containing Runner #1's photograph, and thereby cashed a check in the amount of approximately \$10,000 issued by One Main Financial and made payable to Victim M.W.

15. On or about June 21, 2018, at a Lowe's store in State College, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim M.W. to apply for a Lowe's credit card, issued by Synchrony Bank, in the name of Victim M.W.

16. On or about June 22, 2018, at a U-Haul dealership in Trenton, New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim M.W. to rent a truck from U-Haul, valued at approximately \$15,000.

17. On or about July 7, 2018, defendant CHARLES E. POOLE, III, sent the means of identification of Victim D.W. to False ID Maker #1.

18. On or about July 17, 2018, at a Home Depot store in Broomall, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim D.W. to apply for a Home Depot credit card, issued by Citibank, with a credit limit of approximately \$8,000, in the name of Victim D.W.

19. On or about July 18, 2018, at a Lowe's store in Warrington, PA, at the direction of defendant CHARLES E. POOLE, III, a co-conspirator used the means of identification of Victim H.A. to apply for a Lowe's credit card, issued by Synchrony Bank, with a credit limit of approximately \$8,000, in the name of Victim H.A.

20. On or before August 4, 2018, in the Eastern District of Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, False ID Maker #1 manufactured a false Pennsylvania driver's license in the name of Victim V.H. but containing the photograph of Runner #1, using the means of identification of Victim V.H. and a photograph of Runner #1, both of which had been provided by defendant POOLE

21. On or about August 4, 2018, at a Home Depot store in Broomall, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H. to apply for a Home Depot credit card, issued by Citibank, in the name of Victim V.H., and then purchased approximately \$919.99 worth of merchandise charged to that Home Depot credit card.

22. On or about August 4, 2018, a co-conspirator accessed the internet from the residence of defendant CHARLES E. POOLE, III, in Philadelphia, Pennsylvania, and used the means of identification of victim V.H., including V.H.'s name, address, date of birth, and social security number, to apply for a personal loan in the amount of approximately \$12,000 from One Main Financial through the submission of an online application in Victim V.H.'s name.

23. On or about August 4, 2018, at a Lowe's store in Lansdale, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H. to apply for a Lowe's credit card, issued by Synchrony Bank, in the name of Victim V.H.

24. On or about August 5, 2018, at a Lowe's store in Hamilton, New Jersey at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H. to purchase approximately \$6,138 worth of merchandise.

25. On or about August 12, 2018, at a Lowe's store in Oaks, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim J.P. to purchase approximately \$4,806.43 worth of merchandise.

26. On or about August 14, 2018, defendant CHARLES E. POOLE, III sent the means of identification of Victims R.W., P.W., and A.H. to False ID Maker #1.

27. On or about August 14, 2018, defendant CHARLES E. POOLE, III sent the means of identification of Victim H.G. to False ID Maker #1.

28. On or before June 18, 2018, defendant CHARLES E. POOLE, III, recruited a co-conspirator known to the grand jury (hereinafter "Runner #2"), to pose as Victims by promising Runner #2 a share of the proceeds

29. On or before August 18, 2018, in the Eastern District of Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, False ID Maker #1 manufactured a false Pennsylvania driver's license in the name of Victim R.W. but containing the photograph of Runner #2, using the means of identification of Victim R.W. and a photograph of Runner #2, both of which had been provided by defendant POOLE.

30. On or before August 18, 2018, in the Eastern District of Pennsylvania, False ID Maker #1 gave defendant CHARLES E. POOLE, III a false driver's license in the name of Victim R.W. but containing the photograph of Runner #2.

31. On or before August 18, 2018, in the Eastern District of Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, False ID Maker #1 manufactured a false Pennsylvania driver's license in the name of Victim H.G. but containing the photograph of Runner #2, using the means of identification of Victim H.G. and a photograph of Runner #2, both of which had been provided by defendant POOLE.

32. On or before August 18, 2018, in the Eastern District of Pennsylvania, False ID Maker #1 gave defendant CHARLES E. POOLE, III a false driver's license in the name of Victim H.G. but containing the photograph of Runner #2.

33. On or before August 18, 2018, defendant CHARLES E. POOLE, III gave Runner #2 a false Pennsylvania driver's license in the name of Victim H.G. but containing the

photograph of Runner #2.

34. On or before August 18, 2018, defendant CHARLES E. POOLE, III gave Runner #2 a false Pennsylvania driver's license in the name of Victim R.W. but containing the photograph of Runner #2.

35. On or about August 18, 2018, at a Gap clothing store in Philadelphia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim R.W., including a fraudulent driver's license manufactured by False ID Maker #1, to access R.W.'s existing Gap credit card account ending in 4384, issued by Synchrony Bank, to purchase approximately \$483.30 worth of merchandise.

36. On or about August 18, 2018, at a Home Depot store in Frazer, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim H.G., including a fraudulent driver's license manufactured by False ID Maker #1, to apply for a Home Depot credit card, issued by Citibank, with a credit limit of approximately \$8,000, in the name of Victim H.G.

37. On or about August 19, 2018, at a Gap clothing store in King of Prussia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim R.W., including a fraudulent driver's license manufactured by False ID Maker #1, to access R.W.'s existing Gap credit card account ending in 4384, issued by Synchrony Bank, to purchase approximately \$279.99 worth of merchandise.

38. On or about August 19, 2018, at a Best Buy store in East Hanover, New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim R.W., including a fraudulent driver's license manufactured by False ID Maker #1, to apply for a Best Buy credit card, issued by Citibank, with a credit limit of

approximately \$2,001, in the name of Victim R.W.

39. On or about August 19, 2018, during a telephone call with a Best Buy customer service representative, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim R.W., including R.W.'s name, date of birth, and social security number, to attempt without success to purchase merchandise from Best Buy to be charged to the recently-applied-for Best Buy credit card in the name of Victim R.W.

40. On or about August 21, 2018, a co-conspirator accessed the internet from the residence of defendant CHARLES E. POOLE, III, in Philadelphia, Pennsylvania, and used the means of identification of victim R.W., including R.W.'s name, address, date of birth, and social security number, to apply for a personal loan in the amount of approximately \$10,000 from One Main Financial through the submission of an online application in Victim R.W.'s name.

41. On or about August 21, 2018, a co-conspirator accessed the internet from the residence of defendant CHARLES E. POOLE, III, in Philadelphia, Pennsylvania, and used the means of identification of victim H.G., including H.G.'s name, address, date of birth, and social security number, to apply for a personal loan in the amount of approximately \$10,000 from One Main Financial through the submission of an online application in Victim H.G.'s name.

42. On or about August 21, 2018, at a Lowe's store in East Caln Township, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim H.G., including a fraudulent driver's license manufactured by False ID Maker #1, to apply for and obtain approval for a Lowe's credit card ending in 9229, with a credit limit of approximately \$8,000, issued by Synchrony Bank in the name of Victim

H.G.

43. On or about August 22, 2018, defendant CHARLES E. POOLE, III drove Runner #1 to the One Main Financial branch office in East Norriton Township, Pennsylvania, and instructed her to enter the branch, pose as Victim R.W. using means of identification provided by defendant POOLE, and obtain a check in the amount of approximately \$10,000 that defendant POOLE expected to be issued based on a prior on-line loan application submitted in the name of Victim R.W.

44. On or about August 22, 2018, at the One Main Financial branch office in East Norriton Township, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing Runner #1's photograph, and a copy of Victim R.W.'s TD Bank statement, all of which had been given to her by defendant CHARLES E. POOLE, III, and attempted without success to obtain a check in the amount of approximately \$10,000 that Runner #1 expected to be issued based on a fraudulent loan application submitted by a co-conspirator using Victim R.W.'s means of identification.

45. On or before October 18, 2018, in the Eastern District of Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, False ID Maker #1 manufactured a false Pennsylvania driver's license in the name of Victim M.L. but containing the photograph of Runner #2, using the means of identification of Victim M.L. and a photograph of Runner #2, both of which had been provided by defendant POOLE.

46. On or before October 18, 2018, in the Eastern District of Pennsylvania, False ID Maker #1 gave defendant CHARLES E. POOLE, III a false driver's license in the name of Victim M.L. but containing the photograph of Runner #2.

47. On or before October 18, 2018, defendant CHARLES E. POOLE, III gave Runner #2 a false Pennsylvania driver's license in the name of Victim M.L. but containing the photograph of Runner #2.

48. On or about October 18, 2018, at a Sears Hardware store in Norristown, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim M.L., including a fraudulent driver's license in the name of M.L. manufactured by False ID Maker #1, to apply for and obtain a Sears MasterCard ending in 7258, with a credit limit of approximately \$8,000, issued by Citibank in the name of Victim M.L., and then utilized the credit card to purchase approximately \$5,935.97 worth of merchandise.

49. On or about October 20, 2018, a co-conspirator accessed the internet and used the means of identification of victim M.L., including M.L.'s name, address, date of birth, and social security number, to apply for a personal loan in the amount of approximately \$12,000 from One Main Financial through the submission of an online application in Victim M.L.'s name.

50. On or about October 20, 2018, at a Lowe's store in Havertown, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim M.L., including a fraudulent driver's license manufactured by False ID Maker #1, to apply for and obtain a Lowe's credit card ending in 6043, with a credit limit of approximately \$7,000, issued by Synchrony Bank in the name of M.L.

51. On or about October 20, 2018, at the direction of defendant CHARLES E. POOLE, III, Runner #2 entered a United States Post Office in Lansdale, Pennsylvania, and used the means of identification of Victim M.L., including a fraudulent driver's license manufactured

by False ID Maker #1, to place a mail hold on Victim M.L.'s mail so that the mail, including newly-obtained credit cards, would not be delivered to M.L.'s residence and would instead be held at the United States Post Office for pickup by Runner #2.

52. On or about October 21, 2018, at a Lowe's store in Mount Holly, New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #2 used the means of identification of Victim M.L., including a fraudulent driver's license manufactured by False ID Maker #1, to access the newly-obtained credit account ending in 6043 to purchase approximately \$5,279 worth of merchandise.

53. On or about October 21, 2018, at a U-Haul branch in Maple Shade, New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #2 posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license manufactured by False ID Maker #1, and rented a U-Haul truck in Victim M.L.'s name.

54. On or about October 23, 2018, at the Nordstrom Rack store in Lawrence Township, New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #2 posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license manufactured by False ID Maker #1, to apply for a Nordstrom credit card with a credit limit of approximately \$5,000, issued by TD Bank in the name of Victim M.L.

55. On or about October 23, 2018, at a Raymour and Flanigan Furniture and Mattress store in Lawrence Township, New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #2 posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license manufactured by False ID Maker #1, to apply for and obtain approval for a \$10,000 Raymour and Flanigan credit card ending in 9762, issued by TD Bank in the name of Victim M.L. and then utilized the credit card to order approximately \$9,596.20 in

furniture to be delivered to an address in Trenton, New Jersey.

56. On or about October 25, 2018, at the One Main Financial branch office located in Hatfield, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #2 posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license manufactured by False ID Maker #1, and attempted without success to obtain a check in the amount of approximately \$10,000.

57. On or about October 25, 2018, in Hatfield, Pennsylvania, defendant CHARLES E. POOLE, III possessed approximately four fraudulent Pennsylvania driver's licenses, including approximately two fraudulent Pennsylvania driver's licenses containing Runner #2's photograph, and the means of identification of Victim R.W.

58. On or before October 29, 2018, Runner #2 caused Citibank to send via United States Mail a Sears MasterCard ending in 7258 with a credit limit of approximately \$8,000 to Victim M.L., which was delivered to and held for pickup at the United States Post Office in Lansdale, Pennsylvania.

59. On or before October 29, 2018, Runner #2 caused Synchrony Bank to send via United States Mail a Lowe's credit card ending in 6043 to Victim M.L., which was delivered to and held for pickup at the United States Post Office in Lansdale, Pennsylvania.

60. Sometime prior to November 2, 2018, False ID Maker #1 ordered approximately 500 counterfeit Pennsylvania driver's license holograms, which could be used to create counterfeit Pennsylvania driver's licenses that would appear to be genuine, from an unknown individual in China via the internet from the Eastern District of Pennsylvania.

61. On or about November 2, 2018, False ID Maker #1 caused approximately 500 counterfeit Pennsylvania driver's license holograms to be shipped in foreign commerce from

China to the Eastern District of Pennsylvania via private commercial interstate and foreign carrier.

62. On or about November 6, 2018, in the Eastern District of Pennsylvania, False ID Maker #1 possessed approximately 500 Pennsylvania driver's license holograms, additional holograms for Texas, Connecticut, New Jersey, and Florida, one embossing machine, one paper trimmer, one laminator, one magnetic stripe card reader, approximately four printers, physical documents containing the means of identification of Victims P.W., R.W., A.H., H.G., V.H., A.M., R.H., A.A., M.L., B.S., and H.A., photographs of Runner #2 and other Runners, loan documentation from One Main Financial, blank social security cards, and computers and digital storage media containing digital files of approximately 98 counterfeit Pennsylvania drivers' licenses.

63. On or about February 26, 2019, at a car dealership in Philadelphia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, a co-conspirator known to the grand jury (hereinafter "Runner #3") posed as Victim V.P. and used the means of identification of Victim V.P., including a fraudulent Pennsylvania drivers' license in Victim V.P.'s name but containing Runner #3's photograph, to obtain an auto loan and purchase a 2015 Cadillac Escalade for approximately \$50,000.

64. On or about April 26, 2019, defendant CHARLES E. POOLE, III, drove a co-conspirator known to the grand jury (hereinafter "Runner #4"), to a PENNDOT location in Lawndale, Pennsylvania, provided Runner #4 with the means of identification of Victim E.R., and instructed Runner #4 to go into the PENNDOT location, pretend to be E.R., claim to have lost her license, and ask for a duplicate driver's license to be printed.

65. On or about April 26, 2019, at a PENNDOT location in Lawndale,

Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #4 posed as Victim E.R using the means of identification of Victim E.R. that had been provided to her by defendant POOLE, and obtained a duplicate driver's license in Victim E.R.'s name.

66. On or about April 26, 2019, at a La-Z-Boy store in New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the duplicate Pennsylvania driver's license that she had previously obtained in the name of Victim E.R., to apply for instant credit and to obtain a La-Z-Boy credit card issued by Synchrony Bank, in the name of Victim E.R.

67. On or about April 28, 2019, at a Neiman Marcus store in New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the duplicate Pennsylvania drivers' license in Victim E.R.'s name, to apply for instant credit and to obtain a Neiman Marcus credit card issued by Capital One, in the name of Victim E.R.

68. On or about April 28, 2019, at a Neiman Marcus store in New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the then-issued Neiman Marcus credit card account ending in 1753, to purchase merchandise with a retail value of approximately \$4,724.

69. On or about April 29, 2019, at a Neiman Marcus store in New Jersey, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the newly issued Neiman Marcus credit card account ending in 1753, to purchase merchandise with a retail value of approximately \$1,400.

70. On or about April 29, 2019, at a La-Z-Boy store in Delaware, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of

Victim E.R., including the newly issued La-Z-Boy credit card account ending in 2310, to purchase merchandise with a retail value of approximately \$9,200.

71. On or about April 30, 2019, at a Lowe's store in Lancaster, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including a drivers' license in Victim E.R.'s name, to apply for instant credit and to obtain a Lowe's credit card issued by Synchrony Bank, in the name of Victim E.R.

72. On or about April 30, 2019, at a Lowe's store in Lancaster, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the then-issued Lowe's credit card account ending in 4143, to purchase merchandise with a retail value of approximately \$6,023.54.

73. On or about May 1, 2019, at a Lowe's store in Lancaster, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the newly issued Lowe's credit card account ending in 4143, to purchase merchandise with a retail value of approximately \$1,959.12.

74. On or about May 2, 2019, at a Tractor Supply Company store in Mount Joy, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including a drivers' license in Victim E.R.'s name, to apply for instant credit and to obtain a Tractor Supply Company credit card issued by Citibank, in the name of Victim E.R.

75. On or about May 2, 2019, at a Tractor Supply Company store in Mount Joy, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the newly issued Tractor Supply Company

credit card account ending in 6562, to purchase merchandise with a retail value of approximately \$4,149.63.

76. On or about May 4, 2019, at a Johnny Janosik World of Furniture store in Delaware, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including a drivers' license in Victim E.R.'s name, to apply for instant credit and to obtain a Johnny Janosik credit card, issued by Wells Fargo Bank, in the name of Victim E.R.

77. On or about May 4, 2019, at a Johnny Janosik World of Furniture store in Delaware, at the direction of defendant CHARLES E. POOLE, III, Runner #4 used the means of identification of Victim E.R., including the then-issued Johnny Janosik credit card account ending in 9340, to purchase furniture with a retail value of approximately \$4,882.

78. On or about February 6, 2020, defendant CHARLES E. POOLE, III drove a co-conspirator known to the grand jury (hereinafter "Runner #5"), to a Home Depot store in Bensalem, Pennsylvania, for the purpose of attempting to obtain instant credit at the Home Depot using the means of identification of Victim L.P.

79. On or about February 6, 2020, at a Home Depot store in Bensalem, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #5 used the means of identification of Victim L.P., including a fraudulent driver's license in Victim L.P.'s name but containing Runner #5's photograph, to apply for a Home Depot credit card, issued by Citibank, in the name of Victim L.P.

80. On or about February 6, 2020, in Bensalem, Pennsylvania, Runner #5 possessed false drivers' licenses in the names of Victims L.P. and E.B., both of which contained Runner #5's photograph.

81. On or about February 6, 2020, in Bensalem, Pennsylvania, while driving the 2015 Cadillac Escalade that had been obtained by Runner #3 posing as Victim V.P., defendant CHARLES E. POOLE, III falsely told police officers that the 2015 Cadillac Escalade belonged to his “girlfriend,” Victim V.P., whom defendant POOLE identified by name.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

INTRODUCTORY ALLEGATIONS

1. Paragraphs 1 through 10 of the “Introduction” section of Count One are incorporated here.

THE CONSPIRACY

2. Beginning in or about or sometime prior to February 2018, and continuing until in or about February 2020, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the District of Delaware, and elsewhere, defendant

CHARLES E. POOLE, III

conspired and agreed with others known and unknown, to commit offenses against the United States, that is, to: (a) knowingly and without lawful authority produce a false identification document; and (b) knowingly transfer a false identification document knowing that such document was produced without lawful authority, in violation of Title 18, United States Code, Sections 1028(a)(1) and 1028(a)(2), respectively.

MANNER AND MEANS

3. Paragraphs 12 through 33 of the “Manner and Means” section of Count One are incorporated here.

OVERT ACTS

4. In furtherance of the conspiracy, defendant CHARLES E. POOLE, III and other co-conspirators known and unknown committed overt acts in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the District of Delaware, and elsewhere, including among others Overt Acts 1 through 79 alleged in the “Overt

Acts” section of Count One, which are incorporated here.

All in violation of Title 18, United States Code, Sections 1028(f), 1028(b)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

INTRODUCTORY ALLEGATIONS

1. Paragraphs 1 through 10 of the “Introduction” section of Count One are incorporated here.

THE CONSPIRACY

2. Beginning in or about or sometime prior to February 2018, and continuing until in or about February 2020, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the District of Delaware, and elsewhere, defendant

CHARLES E. POOLE, III

conspired and agreed with others known and unknown, to commit offenses against the United States, that is, to knowingly and with intent to defraud traffic in and use one or more unauthorized access devices during any one year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

3. Paragraphs 12 through 33 of the “Manner and Means” section of Count One are incorporated here.

OVERT ACTS

4. In furtherance of the conspiracy, defendant CHARLES E. POOLE, III; and other co-conspirators known and unknown, committed overt acts in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the District of Delaware, and elsewhere, including among others Overt Acts 1 through 79 alleged in the “Overt

Acts” section of Count One, which are incorporated here.

All in violation of Title 18, United States Code, Sections 1029(b)(2),
1029(c)(1)(A)(i).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Wells Fargo Bank, N.A. (“Wells Fargo Bank”) was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 3511.

2. From in or about or sometime prior to June 2018, and continuing through in or about November 2018, in the Eastern District of Pennsylvania and elsewhere, defendant

CHARLES E. POOLE, III

together with others known and unknown, knowingly executed, and aided and abetted the execution of, a scheme to defraud Wells Fargo Bank and to obtain monies owned by and under the care, custody, and control of Wells Fargo Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Paragraphs 12 through 21 of the “Manner and Means” Section of Count One are incorporated here.

4. Overt Acts 3, 17, 20, and 62 of the “Overt Acts” Section of Count One are incorporated here.

5. Defendant CHARLES E. POOLE, III, drove Runners to Wells Fargo Bank branches.

6. Defendant CHARLES E. POOLE, III, gave Runners the means of identification of Victims who were Wells Fargo Bank customers and false drivers’ licenses in the names of Victims but containing Runners’ photographs, and instructed Runners to withdraw money from the Victims’ Wells Fargo bank accounts, all without the Victims’ knowledge and

consent.

7. Runners entered Wells Fargo Bank branches and used the false drivers' licenses and other means of identification of the Victims to pose as the Victims and withdraw and attempt to withdraw funds from the Victims' Wells Fargo bank accounts.

ACCOUNTS OF VICTIM D.W.
(\$9,536 ACTUAL LOSS)

8. On or about July 16, 2018, at a Wells Fargo Branch located at 101 E. Olney Avenue, Philadelphia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 accompanied an unidentified blind woman and together they used the means of identification of Victim D.W., including Victim D.W.'s name, address, date of birth, and Wells Fargo Bank checking account number, and posed as Victim D.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim D.W.'s name, to withdraw approximately \$8,636 cash from the Wells Fargo Bank checking account of Victim D.W. ending in 4180.

9. On or about July 16, 2018, at a Wells Fargo Branch located at 341 W. Cheltenham Avenue, Philadelphia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 accompanied an unidentified blind woman and together they used the means of identification of Victim D.W., including Victim D.W.'s name, address, date of birth, and Wells Fargo Bank savings account number, and posed as Victim D.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim D.W.'s name, to withdraw approximately \$900 cash from the Wells Fargo Bank savings account of Victim D.W. ending in 6288.

ACCOUNTS OF VICTIM V.H.
(\$4,700 ACTUAL LOSS, \$36,700 INTENDED LOSS)

10. On or about August 6, 2018, at a Wells Fargo Branch located in Springfield, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H., including Victim V.H.'s name, address, date of birth, and Wells Fargo Bank account number, and posed as Victim V.H. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim V.H.'s name but containing Runner #1's photograph, and attempted without success to withdraw approximately \$6,000 from Victim V.H.'s account.

11. On or about August 7, 2018, at a Wells Fargo Branch located in Philadelphia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H., including Victim V.H.'s name, address, date of birth, and Wells Fargo Bank account number, and posed as Victim V.H. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim V.H.'s name but containing Runner #1's photograph, to withdraw approximately \$4,700 cash from Victim V.H.'s account.

12. On or about August 7, 2018, at a Wells Fargo Branch located in Bala Cynwyd, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H., including Victim V.H.'s name, address, date of birth, and Wells Fargo Bank account number, and attempted without success to withdraw approximately \$13,000 cash from Victim V.H.'s account.

13. On or about August 7, 2018, at a Wells Fargo Branch located in Philadelphia, Pennsylvania, at the direction of defendant CHARLES E. POOLE, III, Runner #1 used the means of identification of Victim V.H., including Victim V.H.'s name, address, date of

birth, and Wells Fargo Bank account number, and attempted without success to withdraw approximately \$13,000 cash from Victim V.H.'s account.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this Information, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 18409.

2. From in or about or sometime prior to June 2018, and continuing through in or about November 2018, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

CHARLES E. POOLE, III

together with others known and unknown, knowingly executed, and aided and abetted the execution of, a scheme to defraud TD Bank and to obtain monies owned by and under the care, custody, and control of TD Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Paragraphs 12 through 21 of the “Manner and Means” Section of Count One are incorporated here.

4. Paragraphs 26, 28 through 31, 57, and 62 of the “Overt Acts” Section of Count One are incorporated here.

5. Defendant CHARLES E. POOLE, III drove Runners to TD Bank branches.

6. Defendant CHARLES E. POOLE, III, gave Runners the means of identification of TD Bank customers and false drivers’ licenses in the names of Victims but containing Runners’ photographs, and instructed Runners to pose as the Victims and withdraw

money from the Victims' TD Bank accounts, all without the Victims' knowledge and consent.

7. Runners entered TD Bank branches and used the false drivers' licenses and other means of identification of the Victims to pose as the Victims and withdraw and attempt to withdraw funds from the Victims' TD Bank accounts.

ACCOUNT OF VICTIM R.W.
(Intended Loss of \$8,000)

8. On or about or before August 21, 2018, defendant CHARLES E. POOLE, III, provided Runner #2 with the means of identification of victim R.W., including Victim R.W.'s name, address, date of birth, and TD Bank checking account number, as well as a false Pennsylvania driver's license in Victim R.W.'s name but containing Runner #2's photograph, and instructed Runner #2 to use the means of identification and false driver's license to pose as Victim R.W. and attempt to withdraw funds from Victim R.W.'s TD Bank account.

9. On or about August 21, 2018, at a TD Bank branch located in East Windsor, New Jersey, Runner #2 used the means of identification of Victim R.W., including Victim R.W.'s name, address, date of birth, and TD Bank checking account number ending in 5731, and posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing Runner #2's photograph, and deposited \$30 cash into Victim R.W.'s TD Bank account ending in 5731.

10. On or about August 21, 2018, at a TD Bank branch located in Ewing, New Jersey, Runner #2 used the means of identification of Victim R.W., including Victim R.W.'s name, address, date of birth, and TD Bank account number, and posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing Runner #2's photograph, and attempted without success to withdraw approximately \$8,000 cash from R.W.'s TD Bank account ending in 5731.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2019, in Lancaster County, within the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES E. POOLE, III

knowingly and with intent to defraud, used, and aided and abetted the use of, an unauthorized access device, namely a Lowe's credit card ending in 4143, issued by Synchrony Bank in the name of E.R., and by such conduct obtained property having a value of approximately \$6,023.54, said use affecting interstate and foreign commerce in that Lowe's was a business then engaged in interstate and foreign commerce selling merchandise manufactured outside of the Commonwealth of Pennsylvania and outside of the United States.

In violation of Title 18, United States Code, Sections 1029(a)(2), (c)(1)(A)(i), and

2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2019, in Lancaster County, within the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES E. POOLE, III

knowingly and with intent to defraud, used, and aided and abetted the use of, an unauthorized access device, namely a Tractor Supply Company credit card ending in 6562, issued by Citibank in the name of E.R., and by such conduct obtained property having a value of approximately \$4,149.63, said use affecting interstate and foreign commerce in that Tractor Supply Company was a business then engaged in interstate and foreign commerce selling merchandise manufactured outside of the Commonwealth of Pennsylvania and outside of the United States.

In violation of Title 18, United States Code, Sections 1029(a)(2), (c)(1)(A)(i), and

2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2018, in the Eastern District of Pennsylvania, and elsewhere,
defendant

CHARLES E. POOLE, III

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, address, and social security number of M.W., during and in relation to conspiracy to commit access device fraud, in violation of Title 18, United States Code, Section 1029(b)(2), as charged in Count Three of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4), and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 16, 2018, in the Eastern District of Pennsylvania, and elsewhere,
defendant

CHARLES E. POOLE, III

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, address, date of birth, and Wells Fargo Bank checking account number, and social security number of D.W., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344, as charged in Count Four of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES E. POOLE, III

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, address, and social security number of H.G., during and in relation to conspiracy to commit mail and wire fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 21, 2018, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

CHARLES E. POOLE, III

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, address, TD Bank account number, and social security number of R.W., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344, as charged in Count Five of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 18, 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES E. POOLE, III

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, address, and social security number of M.L., during and in relation to conspiracy to commit mail and wire fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 2, 2019, in Lancaster County, within the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES E. POOLE, III

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use, of a means of identification of another person, that is, the name, date of birth, address, and driver's license number of E.R., during and in relation to access device fraud, in violation of Title 18, United States Code, Section 1029(a)(2), as charged in Count Seven of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4), and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1028, 1029, 1344, and 1349, set forth in this indictment, defendant

CHARLES E. POOLE, III

shall forfeit to the United States of America:

- (a) any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the violations of Title 18, United States Code, Sections 1028, 1029 and 1349, including, but not limited to \$103,181 in United States currency (money judgment);
- (b) any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of the violations of Title 18, United States Code, Sections 1028, 1029, and 1344, including, but not limited to, the sum of \$103,181 in United States currency (money judgment);
- (c) any personal property used or intended to be used to commit the violations of Title 18, United States Code, Sections 1028 and 1029; and
- (d) all illicit authentication features, identification documents, document-making implements, or means of identification\.

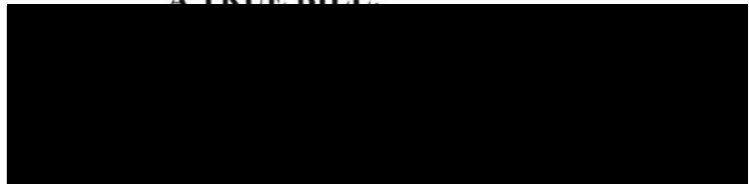
2. If any of the property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of this Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Sections 982(b)(1), 1028(g), and 1029(c)(2), and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2), 1028(b)(5) and (h), and 1029(c)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



Ronald Barock for

JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

CHARLES E. POOLE, III

INDICTMENT

Counts

- 18 U.S.C. § 1349 (conspiracy to commit mail and wire fraud – 1 count);
- 18 U.S.C. § 11028(f) (conspiracy to commit identification document fraud – 1 count);
- 18 U.S.C. § 1029(b)(2) (conspiracy to commit access device fraud) – 1 count)
- 18 U.S.C. § 1344 (bank fraud) – 2 counts)
- 18 U.S.C. § 1029(a)(2) (access device fraud) – 2 counts)
- 18 U.S.C. § 1028A(a)(1) (aggravated identity theft) – 6 counts)
- 18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

Filed in open court this 15 day,
Of June A.D. 20 23

Clerk

Bail, \$ _____
